

1 Honorable John C. Coughenour  
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11 UNITED STATES DISTRICT COURT  
12 WESTERN DISTRICT OF WASHINGTON  
13 SEATTLE  
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18 UNITED STATES OF AMERICA, ) No. CR06-0107JCC  
19 Plaintiff, ) STIPULATED MOTION AND ORDER  
20 vs. ) CONTINUING TRIAL DATE AND  
21 ) PRETRIAL MOTIONS CUTOFF  
22 CHRISTOPHER J. NEAL, )  
23 Defendants. )  
24 )  
25 )  
26

18 STIPULATION

19 The United States, by and through John Lulejian, Assistant United States  
20 Attorney, and defendant Christopher J. Neal, by and through his attorney, Anna M.  
21 Tolin, hereby stipulate and agree that good cause exists to continue trial in this case for  
22 approximately 60 days from May 30, 2006 to July 24, 2006, and to extend the pretrial  
23 motions date cutoff to June 29, 2006.

24 The parties agree that this continuance is necessary for the reasons below. The  
25 discovery process is not yet complete. This case is based upon evidence and

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ANNA M. TOLIN  
Attorney at Law  
2001 Western Avenue, Suite 200  
Seattle, WA 98121  
(206) 812-5850

1 allegations primarily developed by local law enforcement officers, and additional time is  
2 needed to complete discovery and allow the defense to investigate and analyze the  
3 evidence in this case. Both sides require additional time to research and analyze  
4 multiple legal issues as well as to explore possible agreements to resolve this matter  
5 prior to trial. The defendant has consented to this continuance, and a waiver of speedy  
6 trial will be filed with the Court.

7 The parties agree that the requested continuance is necessary to avoid a  
8 miscarriage of justice and to ensure the effective assistance of counsel.

9 Respectfully submitted this 28<sup>th</sup> day of April, 2006.

10 \_\_\_\_\_/s/  
11 John Lulejian  
12 Assistant United States Attorney  
13 700 Stewart Street, Suite 5220  
14 Seattle, WA 98101  
(206) 553-4065  
john.lulejian@usdoj.gov

15 \_\_\_\_\_/s/  
16 Anna M. Tolin, WSBA #22071  
17 Attorney for Christopher Neal  
18 Market Place Two, Suite 200  
19 2001 Western Avenue  
Seattle, WA 98121  
(206) 812-5850  
anna@annatolin.com

## ORDER

Based upon the foregoing stipulation of the parties, and upon all of the papers and proceedings previously filed herein, the Court hereby finds that good cause exists to extend the trial date from May 30, 2006 until July 24, 2006 and to extend the pretrial motions cutoff to June 29, 2006.

The Court further finds that after considering the interests of the defendant and the public in a speedy trial, failure to grant the requested continuance would likely result in a miscarriage of justice and deny the parties the reasonable time necessary for effective presentation, taking into account the exercise of due diligence

SO ORDERED.

DATED this 3rd day of May, 2006.

John C. Coyne, Jr.

JOHN C. COUGHENOUR  
UNITED STATES DISTRICT JUDGE

Presented by:

/s/  
John Lulejian  
Assistant United States Attorney

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/s/  
Anna M. Tolin, WSBA #22071  
Attorney for Christopher Neal

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ANNA M. TOLIN  
Attorney at Law  
2001 Western Avenue, Suite 200  
Seattle, WA 98121  
(206) 812-5850